

B1040 (FORM 1040) (12/15)

<b>ADVERSARY PROCEEDING COVER SHEET</b> (Instructions on Reverse)		<b>ADVERSARY PROCEEDING NUMBER</b> (Court Use Only)
<b>PLAINTIFFS</b> Christian Williams	<b>DEFENDANTS</b> Adeoluwatoke Adetayo	
<b>ATTORNEYS</b> (Firm Name, Address, and Telephone No.)	<b>ATTORNEYS</b> (If Known) Will B. Geer	
<b>PARTY</b> (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	<b>PARTY</b> (Check One Box Only) <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	
<b>CAUSE OF ACTION</b> (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) Last year (2019), my fiance and I booked Adeoluwatoke Adetayo's venue for our wedding, paid over \$6,000 to secure our venue, and will not receive the service we signed a contract for and paid for, which is in May 2020.		
<b>NATURE OF SUIT</b> (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)		
<b>FRBP 7001(1) – Recovery of Money/Property</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property</li> <li><input type="checkbox"/> 12-Recovery of money/property - §547 preference</li> <li><input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer</li> <li><input checked="" type="checkbox"/> 14-Recovery of money/property - other</li> </ul> <b>FRBP 7001(2) – Validity, Priority or Extent of Lien</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property</li> </ul> <b>FRBP 7001(3) – Approval of Sale of Property</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h)</li> </ul> <b>FRBP 7001(4) – Objection/Revocation of Discharge</b> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e)</li> </ul> <b>FRBP 7001(5) – Revocation of Confirmation</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 51-Revocation of confirmation</li> </ul> <b>FRBP 7001(6) – Dischargeability</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims</li> <li><input checked="" type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud</li> <li><input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny</li> </ul> (continued next column)		
<b>FRBP 7001(6) – Dischargeability (continued)</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support</li> <li><input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury</li> <li><input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan</li> <li><input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support)</li> <li><input type="checkbox"/> 65-Dischargeability - other</li> </ul> <b>FRBP 7001(7) – Injunctive Relief</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 71-Injunctive relief – imposition of stay</li> <li><input type="checkbox"/> 72-Injunctive relief – other</li> </ul> <b>FRBP 7001(8) Subordination of Claim or Interest</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 81-Subordination of claim or interest</li> </ul> <b>FRBP 7001(9) Declaratory Judgment</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 91-Declaratory judgment</li> </ul> <b>FRBP 7001(10) Determination of Removed Action</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 01-Determination of removed claim or cause</li> </ul> <b>Other</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa et.seq.</li> <li><input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)</li> </ul>		
<input type="checkbox"/> Check if this case involves a substantive issue of state law	<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23	
<input type="checkbox"/> Check if a jury trial is demanded in complaint	Demand \$ 6,000	
<b>Other Relief Sought</b> I believe jail-time is necessary for continuing to take my money on her website, knowing most brides had no idea what was going on!		

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
M. REGINA THOMAS CLERK  
DEPUTY CLERK  
RAHAN SMITH

2020 FEB 26 PM 12: 50

B1040 (FORM 1040) (12/15)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR <i>Adeoluwatake Adetayo</i>	BANKRUPTCY CASE NO. <i>20-62546 - wlh</i>	
DISTRICT IN WHICH CASE IS PENDING <i>Northern</i>	DIVISION OFFICE <i>Atlanta</i>	NAME OF JUDGE
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF <i>Christian Williams</i>	DEFENDANT <i>Adeoluwatake Adetayo</i>	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF)  <i>Christian Williams</i>		
DATE <i>2-26-20</i>	PRINT NAME OF ATTORNEY (OR PLAINTIFF) <i>Christian Williams</i>	

#### INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

**Plaintiffs and Defendants.** Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

**Attorneys.** Give the names and addresses of the attorneys, if known.

**Party.** Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

**Demand.** Enter the dollar amount being demanded in the complaint.

**Signature.** This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

UNITED STATES BANKRUPTCY COURT  
Document Page 3 of 4  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:

Adeoluwatoke Adetayo

Debtor

Case No. 20-62546-wlhChapter 7Christian Williams

Plaintiff

Adversary No.

vs.

Adeoluwatoke Adetayo

Defendant

FEBRUARY 26, 2020  
U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT  
OF GEORGIA  
M. REGINA THOMAS  
CLERK

2020 FEB 26 PM 12:50

Object to discharge and challenge whether debts are dischargeable.

Around mid October or late September, my fiance' and I went to visit "Toke Tayo's" venue in Miami Circle in Atlanta, spoke with the booking manager, Jacqueline, and booked Adetayo's venue the same day. We had to sign a contract and make a \$1900 deposit. Since booking, we have been making payments to secure our venue, totaling \$6,000 in January 2020.

In January 2020, I reached out to Adetayo and Jacqueline, but heard nothing back. The contract stated if payments weren't made, we would lose the venue. So my fiance' and I continued paying, only to find out on January 31st that Adetayo had "gone missing". Our wedding is supposed to be May 30, 20, but now we have no venue and lost our money, which was all we had for our wedding. We now are at a complete loss and have no venue. Adetayo nor anyone from her business reached out to us to communicate what was going on. My fiance and I

found out via Instagram that Adefayo took multiple brides' money, but delivered no service. She had no intention of telling couples that there would be no wedding(s) and she still has her website fully up and running to accept clients money! My fiance and I have a three-month old son and the money that Adefayo fraudently took from us could have been used to buy food, clothes, and diapers for him. Your wedding day is supposed to be special, but ours has turned into a complete nightmare. We trusted Adefayo with our business and she took our money and we probably won't be able to book anything reasonable with such short notice. My fiance and I do not have six grand to give away! Adefayo had us sign a contract, took our money, didn't say anything, then filed bankrupt, all without saying a word to us. This is evil and we need our funds back, not only to support our child, but we want a special wedding day still. Please help us recover our funds. I genuinely feel Adefayo knowingly kept taking our money and the maximum punishment should be given to her for what she has done to myself and dozens to hundreds of other people who trusted her, whether it was a wedding or another event.

**Signature** Christian Williams

**Printed Name** Christian Williams

**Address** 1902 Stanton Road East Point, GA

**Telephone Number** 678 920 8021